17. Monthly Average, other than for fecal coliform bacteria, discharge limitations are calculated as the sum of all "daily discharge(s)" measured during a calendar month divided by the number of "daily discharge(s)" measured during that month. When the permit establishes monthly average concentration effluent limitations or conditions, and flow is measured as continuous record or with a totalizer, the monthly average concentration means the arithmetic average (weighted by flow) of all "daily discharge(s)" of concentration determined during the calendar month where C = daily discharge concentration, F = daily flow and n = number of daily samples; monthly average discharge =

$$\frac{C_1F_1 + C_2F_2 + \ldots + C_nF_n}{F_1 + F_2 + \ldots + F_n}$$

When the permit establishes monthly average concentration effluent limitations or conditions, and the flow is not measured as a continuous record, then the monthly average concentration means the arithmetic average of all "daily discharge(s)" of concentration determined during the calendar month.

The monthly average for fecal coliform bacteria is the geometric mean of the values for all effluent samples collected during a calendar month.

18. National Pollutant Discharge Elimination System (NPDES) means the national program for issuing, modifying, revoking and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements, under Sections 307, 318, 402, and 405 of the Clean Water Act.

19. Severe property damage means substantial physical damage to property, damage to the treatment facilities that causes them to become inoperable, or substantial and permanent loss of natural resources that can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

20. Sewage sludge means a solid, semi-solid, or liquid residue generated during the treatment of domestic sewage in a treatment works. Sewage sludge includes, but is not limited to, domestic septage; scum or solids removed in primary, secondary, or advanced wastewater treatment processes; portable toilet pumpings, type III marine sanitation device pumpings (33 CFR part 159); and a material derived from sewage sludge. Sewage sludge does not include ash generated during the firing of sewage sludge in a sewage sludge incinerator or grit and screenings generated during preliminary treatment of domestic sewage in a treatment works.

21. Treatment works means any devices and systems used in the storage, treatment, recycling and reclamation of municipal sewage and industrial wastes of a liquid nature to implement Section 201 of the Clean Water Act, or necessary to recycle or reuse water at the most economical cost over the estimated life of the works, including intercepting sewers, sewage collection systems, pumping, power and other equipment, and their appurtenances, extension, improvement, remodeling, additions, and alterations thereof. (See Part 212 of the Clean Water Act)

22. For fecal coliform bacteria, a sample consists of one effluent grab portion collected during a 24-hour period at peak loads.

23. The term MGD shall mean million gallons per day.

24. The term mg/L shall mean milligrams per liter or parts per million (ppm).

25. The term µg/L shall mean micrograms per liter or parts per billion (ppb).

26. The term ng/L shall mean nanograms per liter or parts per trillion (ppt).

27 Weekly average, other than for fecal coliform bacteria, is the highest allowable arithmetic mean of the daily discharges over a calendar week, calculated as the sum of all "daily discharge(s)" measured during a calendar week divided by the number of "daily discharge(s)" measured during that week. When the permit establishes weekly average concentration effluent limitations or conditions, and flow is measured as continuous record or with a totalizer, the weekly average concentration means the arithmetic average (weighted by flow) of all "daily discharge(s)" of concentration determined during the calendar week where C = daily discharge concentration, F = daily flow and n = number of daily samples; weekly average discharge

$$= \frac{C_1F_1 + C_2F_2 + \ldots + C_nF_n}{F_1 + F_2 + \ldots + F_n}$$

When the permit establishes weekly average concentration effluent limitations or conditions, and the flow is not measured as a continuous record, then the weekly average concentration means the arithmetic average of all "daily discharge(s)" of concentration determined during the calendar week.

The weekly average for fecal coliform bacteria is the geometric mean of the values for all effluent samples collected during a calendar week.

28. Sanitary Wastewater Term(s):

a. 3-hour composite sample consists of three effluent portions collected no closer together than one hour (with the first portion collected no earlier than 10:00 a.m.) over the 3-hour period and composited according to flow, or a sample continuously collected in proportion to flow over the 3-hour period.

b. 6-hour composite sample consists of six effluent portions collected no closer together than one hour (with the first portion collected no earlier than 10:00 a.m.) over the 6-hour period and composited according to flow, or a sample continuously collected in proportion to flow over the 6-hour period.

c. 12-hour composite sample consists of 12 effluent portions collected no closer together than one hour over the 12-hour period and composited according to flow, or a sample continuously collected in proportion to flow over the 12-hour period. The daily sampling intervals shall include the highest flow periods.

d. 24-hour composite sample consists of a minimum of 12 effluent portions collected at equal time intervals over the 24-hour period and combined proportional to flow or a sample continuously collected in proportion to flow over the 24-hour period.

STATEMENT OF BASIS (AI No. 20098) PER20070001

for draft Louisiana Pollutant Discharge Elimination System permit No. **LA0102300** to discharge to waters of the State of Louisiana.

THE APPLICANT IS: International Marine Terminal Partnership
Myrtle Grove Barge Cleaning Facility
18559 Louisiana Hwy. 23
Port Sulphur, LA 70083

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Lisa Kemp

DATE PREPARED: August 23, 2007

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of an expired Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term. Stormwater will be included under this individual permit. Therefore, upon the effective date, the FINAL PERMIT shall replace the previously effective LPDES permits LA0102300 and LAR05N765.

B. LPDES permit - LA0102300
LPDES permit effective date: August 1, 2002
LPDES permit expiration date: July 31, 2007
EPA has not retained enforcement authority.

C. LPDES permits – LAR05N765
LPDES permit issued: October 5, 2006
LPDES permit expiration date: April 30, 2011

D. Date Application Received: August 3, 2007; additional information received by telephone on August 14, 2007, by telephone and email on August 20, 2007, and by telephone on August 21, 2007.

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - barge cleaning, fleeting, and repair facility

The Myrtle Grove facility is an existing barge cleaning (90%) and repair (10%) facility operating between Mississippi River miles 56-58. According to the application, all residual cargo is removed from the barges prior to washing. The residual cargo is either salvaged or disposed of offsite. After removal of the cargo, the barge is thoroughly washed using river water only. Washwater from the barges that contained grains/meals, ores/aggregates, and other miscellaneous products is discharged directly to the Mississippi River. Washwater from barges that contained coal and coke and residual water that accumulates in the barge prior to cleaning are routed through the facility's water treatment system (settlement barge) prior to discharge to

the Mississippi River. Repairs consist of topside welding and patching. Barges are brought to the dry dock which is located at an International Marine Terminal (IMT) finger dock and raised to do welding or patchwork. IMT also owns and operates a fleeting operation at this location.

B. FEE RATE
1. Fee Rating Facility Type: minor
2. Complexity Type: II as per LAC33:IX.1319 Table I and SIC 4463*.
3. Wastewater Type: II
4. SIC code: 4491, 4499, 3731

* In Appendix A - Section IV (Relation of 1987 to 1977 Industries) of the Standard Industrial Classification Manual, the SIC code 4491 is equivalent to a previous SIC code of 4463

C. LOCATION – barge cleaning operations are between River Miles 56- 58 with a dry dock at River Mile 57 on the West Bank, near Myrtle Grove, Plaquemines Parish (Latitude 29° 37' 5" Longitude 89° 54' 30")

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: dry commodity hopper barge washwater
Treatment: none
Location: at the point of discharge from the barge/ship being washed
Flow: intermittent
Discharge Route: to the Mississippi River

Outfall 002

Discharge Type: coal and coke hopper barge washwater
Treatment: settlement barge
Location: at the point of discharge from the settlement barge
Flow: intermittent
Discharge Route: to the Mississippi River

Outfall 03A

Discharge Type: incoming ballast and void water from customer barges
Treatment: none
Location: at the point of discharge from the customer barge wing/void tanks
Flow: intermittent
Discharge Route: to the Mississippi River

Outfall 03B

Discharge Type: maintenance ballast and void water from dry dock and work barges
Treatment: none
Location: at the point of discharge from the dry dock or work barge wing/void tanks
Flow: intermittent
Discharge Route: to the Mississippi River

4. RECEIVING WATERS

STREAM - Mississippi River

BASIN AND SEGMENT - Mississippi River Basin, Segment 070301

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
d. drinking water supply

5. TMDL STATUS

The discharges from International Marine Terminal Partnership are to the Mississippi River, Subsegment 070301 of the Mississippi River Basin. Subsegment 070301 is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDLs have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale, Page 6

Summary of proposed changes from the current LPDES permit:

1. Outfalls 003A and 003B have been changed to 03A and 03B.
2. Maintenance ballast water from the dry dock has been included in the discharge for Outfall 03B. Best Management Requirements for dry docks have been included in Part II of the permit.
3. Best Management Practices for Dock Washdown have been included in Part II of the permit.

7. COMPLIANCE HISTORY/COMMENTS

1. WQMD – There are no open, appealed, or pending OEC enforcement actions as of August 14, 2007.

2. DMR Review/Excursions – Discharge Monitoring Reports (DMRs) for the period beginning January 1, 2005 and ending June 30, 2007 were reviewed. DMRs for the last quarter of 2005 noted that sampling was not done due to the change in personnel post Hurricane Katrina. The following excursions were noted:

Date	Parameter	Outfall	Reported Value	Permit Limits
January, 2006	TSS	002	not done	Report
	pH	002	not done	6.0 – 9.0
July, 2005	COD	002	540 mg/L	400 mg/L
January, 2005	pH	03A	pH minimum 5.61	6.0 -9.0

3. Inspections – The most recent inspection was a site investigation post Hurricane Katrina completed on October 18, 2005. The report noted that the facility had been back in operation for two weeks at that time and was at 60% capacity. No releases or hazards were observed.

8. EXISTING EFFLUENT LIMITS

Outfall 001 – dry commodity barge washwater

No effluent limits are established for washwaters from dry commodity barges. Best Management Practices for barge operations are included in the permit.

Outfall 002 – coal and coke barge washwater

POLLUTANT	LIMITATION Units (Specify)		MONTORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow (MGD)	Report	Report	1/week	Estimate
COD	250 mg/L	400 mg/L	1/week	Grab
TSS	Report	Report	1/month	Grab
pH –Allowable Range (standard units)[2]	6.0 Minimum	9.0 Maximum	1/week	Grab

Outfall 003A – incoming ballast water from customer barges
Outfall 003B – maintenance ballast water

POLLUTANT	LIMITATION Units (Specify)		MONTORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow (MGD)	Report	Report	1/week (*1)	Estimate
COD	---	250 mg/L	1/week (*1)	Grab
Oil & Grease	---	15 mg/L	1/week (*1)	Grab
pH –Allowable Range (standard units)[2]	6.0 Minimum	9.0 Maximum	1/week (*1)	Grab

(*1) Measurement frequency for outfall 003B for the discharge of maintenance ballast water shall be 1/month whenever sampling is required.

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon and migratory waterfowl, which

are listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon and migratory waterfowl. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Rationale for International Marine Terminal Partnership

1. **Outfall 001:** dry commodity hopper barge washwater

Based on BPJ and on permits for similar facilities, no effluent limitations are established for washwaters from barges previously containing dry commodities listed in Attachment 1. Best Management Practices (BMPs) for barge operations are listed in Part II.

2. **Outfall 002:** coal and coke hopper barge washwater

Pollutant	Limitation Mthly Avg:Daily Max (mg/l)	Reference
Flow-MGD	Report:Report	LAC 33:IX.2701.I.1.b
COD	250:400	Similar Discharges; BPJ
TSS	Report:Report	Similar Discharges; BPJ
pH	6.0 - 9.0 s.u.	Similar Discharges; BPJ

BPJ Best Professional Judgment

Treatment: settling barge

Monitoring Frequency: TSS shall be observed once per month and Flow, COD and pH shall be observed once per week at the point of discharge from the settling barge.

Limits Justification: Limits and Monitoring Frequency are based on current guidance for similar discharges from other facilities.

3. **Outfall 03A:** incoming ballast and void water from customer barges
Outfall 03B: maintenance ballast and void water from dry dock and work barges

Pollutant	Limitation Mthly Avg:Daily Max (mg/l)	Reference
Flow-MGD	Report:Report	LAC 33:IX.2701.I.1.b
COD	---:250	Similar Discharges; BPJ
Oil and Grease	---:15	Similar Discharges; BPJ
pH	6.0 - 9.0 s.u.	Similar Discharges; BPJ

BPJ Best Professional Judgment

Treatment: none

Monitoring Frequencies:

Outfall 03A - Flow, COD, Oil & Grease and pH shall be observed once per week at the point of discharge from the incoming customer barge/vessel.

Outfall 03B – Maintenance/dry dock ballast water may be discharged without sampling provided there is no visible oil sheen. Flow and the presence or absence of a sheen shall be recorded for all discharges. The measurement frequency for maintenance/dry dock ballast water shall be 1/month whenever sampling is required.

Limits Justification: Limits and Monitoring Frequency are based on current guidance for similar discharges from other facilities.

This facility is not subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442, because, in accordance with 40 CFR 442.1.a, "this part applies to discharges resulting from cleaning the interior of tanks used to transport chemical, petroleum or food grade cargos." This facility does not clean tanks. Only hopper barges are cleaned.

Storm Water Pollution Prevention Plan (SWP3) Requirement

As per LAC33:IX.2511.B.14.a-k, stormwater discharges from facilities classified as SIC Codes 4491, 4499, and 3731 are considered to be associated with industrial activities and accordingly require SWP3 requirements. This facility does have office space and storage for tools on land. However, an SWP3 is not included in the permit because these areas are included in the SWP3 for the IMT/Myrtle Grove Bulk Terminal (LPDES permit LA0052361). All other operations at the facility are water related operations. Barge, Dock Washdown, and Dry Dock BMPs are comparable to the SWP3 requirements; therefore, these BMP requirements will be applied instead.